RECEIVED
APR 2 8 2000
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
______________ DIVISION

DOCKETED
MAY 0 2 2000

Evelyn J. Hunter)
3308-N-albany St)
Chicago, Il, 60618)
(Name of the plaintiff or plaintiffs))

V.

CIVIL ACTION

NO. 00C 2579

(Case number will be supplied by the assignment clerk)

JUDGE KOCORAS

MAGISTRATE JUDGE SCHENKIER

De Paul University)
1-E-Jackson Blvd.)
Chicago, Il.)
(Name of the defendant or defendants))

COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.

2. The plaintiff is Evelyn J. Hunter of the county of Cook in the state of Illinois.

3. The defendant is De Paul University, who resides at (street address) 25-East-Jackson (city) Chicago (county) Cook (state) Il. (ZIP) 60604

(Defendant's telephone number) (312) – ______________

4) The plaintiff sought employment or was employed by the defendant at

(street address) 25- East- Jackson Blvd

(city) Chicago (county) Cook (state) Il (ZIP code) 60604

5. The plaintiff [check one box]

(a) ☐ was denied employment by the defendant.

(b) ☐ was hired and is still employed by the defendant.

(c) ☒ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) April, (day)______, (year) 1998.

7. (a) The plaintiff [check one box] ☐ *has not* ☒ *has* filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

(I) ☐ the United States Equal Employment Opportunity Commission on or about (month)________ (day)______ (year)_______.

(ii) ☐ the Illinois Department of Human Rights on or about (month) Nov (day) 10 (year) 1998.

(b) If charges *were* filed with an agency indicated above, a copy of the charge is attached. ☒ YES ☐ NO

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

8. (a) ☐ the United States Equal Employment Opportunity Commission has not issued a *Notice of Right to Sue.*

(b) ☒ the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month) March (day) 3 (year) 2000 a copy of which *Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [check all that apply]

(a) ☑ Age (Age Discrimination Employment Act).

(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

(c) ☐ Disability (Americans with Disabilities Act)

(d) ☐ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

(e) ☐ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

(f) ☑ Religion (Title VII of the Civil Rights Act of 1964)

(g) ☐ Sex (Title VII of the Civil Rights Act of 1964)

10. The plaintiff is suing the defendant, a state or local government agency, for discrimination on the basis of race, color, or national origin (42 U.S.C. §1983). ☑ YES ☐ NO

11. Jurisdiction over the statutory violation alleged is conferred as follows: over Title VII claims by 28 U.S.C.§1331, 28 U.S.C.§1343(a)(3), and 42 U.S.C.§2000e-5(f)(3); over 42 U.S.C.§1981 and §1983 by 42 U.S.C.§1988; over the A.D.E.A. by 42 U.S.C.§12117.

12. The defendant [check all that apply]

(a) ☐ failed to hire the plaintiff.

(b) ☑ terminated the plaintiff's employment.

(c) ☐ failed to promote the plaintiff.

(d) ☐ failed to reasonably accommodate the plaintiff's religion.

(e) ☐ failed to reasonably accommodate the plaintiff's disabilities.

(f) ☐ other

(specify): On November 6, 1998 defendant terminated the Plaintiff's employment, for directly responsible for creating a hostile work environment for others.

13. The facts supporting the plaintiff's claim of discrimination are as follows:

Please See attached sheets for the facts.

Item 13. The facts supporting the Plaintiff's claim of discrimination are as follows:

A- I Evelyn J. Hunter (Plaintiff) believe Director Robert Wachowski, Intentiona[l] and willfully, discriminated against me the Plaintiff.

B- On april 5th 1999 I requested a copy of my human resource file, this is when I discovered doucuments in my file that were requested to be removed from my file, and upon request were removed from my file, and later date they were put back into my file, note: these were resolved issues;

I hold Security Director Robert Wachows[ki] responsible for not allowing me to use the restroom as needed. This started a hostile work environment. These issues were resolved when I took this serious complaint to Barbara Schaffer (ombuds person for De Paul University. Since the files were re-entered I do believe it was done to make me look bad and to retailate.

Item 13 Continued:

C – I believe Director Robert Wachowski intentionally and willfully allowed nepotism in the Security Department of De Paul University, Relative's were placed into management's position's and over other relative's which was creating a hostile work environment.

Example: Promoted Mike Dome and Wachowski gave Sgt. Jimmy Warren directive's that were harmful for me Such as denial of using the rest room as needed to keep Warren from being promoted.

D – The end of January 1998 I the Plaintiff, had blood in my Urine, I made a Doctor's appointment and discussed this issue with my Supervisor Frank Bellizzi, Bellizzi granted me permission day to See my Doctor.

Item 13 continued:

D - I the Plaintiff took the Personal day to See my Doctor, on the following day, I was called into the Security Office by assistant Director Mike Dome, when I entered the office, Mike Dome Closed the door and asked me to have a seat, he proceeded to tell me the day I saw my Doctor, would be Considered an un-excused absents, he also stated it would go into my human resources file for one year, I Plaintiff stated to Mike Dome, this is un-fair, Supervisor Frank Bellizzi was aware of my Condition and approved my seeing the Doctor, at this time Mike Dome stated to me that Director Wachowski, wants the day of my seeing my Doctor documented as an un-approved day off, even though I had the note from my Doctor and approval from Supervisor Frank Bellizzi. Mike Dome also stated for me to be Careful as Director Wachowski was building a file on me, I began to Cry,

Item 13 continued:

Therefore, I took the complaint to the Human Resources department and the un-excused absents for seeing my Doctor was retracted.

E— In March 1998 Security Officer Stacey Blocka E-mailed me several times, asking me to join her in a Jovaka Wittness fuction, I also recieved Jovaka Wittness pamplets from Officer Blocka in my mail box in the Security Room. I knew this was a sensitive issue, therefore, I took this situation to my Supervisor Frank Bellizzi, Bellizzi was in the (Security) Mail room some time I removed Jovaka Witness reading material from my mail box. I then told Sgt. Bellizzi of the many E-mail letters I recieved from Officer Blocka reguarding Jovaka Wittness meetings and welcome note. I informed Bellizzi at this time I was aware of this being a sensetive issue and that I did not know how to handle it.

Item 13 continued: at this time Sgt. Bellizzi Stated to me he would talk with Officer Blocher and with Director Wachowski; note: I never did know what Sgt. Bellizzi told Officer Blocher, however, it is in my belief - it only Caused a hostile Work envirionment.

F— It was Sgt. Bellizzi who approached Officer John Lahey and my self, while on duty - at this time Sgt. Bellizzi told both Officer Lahey and my self, that Larry Lewis told him that Stacey Blocher had a Blood Problem.

note: this was a Supervisor giving out Confidential Information about another Officer, and allowing Officer Larry Lewis to discuss it him.

Item 13 Continued:

G- On april 3rd 1998 Security Office Clerk at De Paul University On this day Security Clerk Greene Security Clerk Mary Greene Stated to me the Plaintiff that I better watch out for my job, because lot of young people can replace me, Greene, refered to me as an (Old Hag) Mary Greene also stated to me the Plaintiff- that I will pay for it for going over her Cousin's head who is Mike Dome, refering to the time I was given an un-excused day off for seeing my Doctor after it was approved by Sgt. Bellizzi - then I took it to Human Resources to have retracted as it was approved, for this Ms. Greene said I have to Pay. At this time Ms. Greene stated to me the Plaintiff that she would replace me in uniform, she stated she is now 21 years of age.

Item 13 Continued:

G- Mary Greene also stated to me that my employer was hireing an out side investigator to advise them On how to get rid of Older People in the Security Department legally, that is so no law Suit's will Come about.
Ms. Greene also stated to me that Sgt. Evita Evans would give up her rank and replace me, at Loop Campus and Ms. Greene would go to Lincoln PK. Campus, Ms. Greene also stated she wanted to work under her Cousin (assistant Director Mike Dome and her Mother (Supervisor Maureen Green and her Grand father and two Uncles all at Linkoln PK. Campus, in the Security department.

Item 13 Continued:

G — I the Plaintiff asked Ms. Greene where she got her information, (Ms. Greene) Stated; After I asked her if it was from her relatives; Greene stated (you God damn right) at this time the telephone rang, I stated I needed to use the wash room, Greene stated (no you are not!) I'm not finished talking to you — I Proceeded to go to the wash room, upon returning from the wash room, this is when Mary Greene Threatened me.

note: Refer to Police report attached and investigation report dated April 16th 1998.

This behavior of Ms. Greene I believe was to create a hostile work environment for me to feel Pressure to get rid of me, so Ms. Greene would then move into Security Department.

note: Ms. Greene is now a Security Officer

Item 13 Continued:

H – Officer Stacey Blocher's allegation's made against me are false – I do believe Sgt. Bellizzi and Ms. Mary Greene and Officer Stacey Blocher → started this he said, she said, as a smoke screen, to create a hostile work place, to get rid of older people, to replaced by younger people. as it was Ms. Greene and Sgt. Bellizzi who accused me of saying about Officer Blocher. I was never allowed to face my accuser's, I believe it was for this reason their false accusation's would have blown their smoke screen away.

I – It was Officer Larry Lewis and Sgt. Bellizzi who spoke about Officer Blocher health.

Item 13-continued

I the plaintiff believe all the evidence mentioned above, points to age discrimination, allowed by Director Robert Wachowski, he never allowed for me to face my accuser's, he also allowed nepotisms to smoke screen the truth, for me to be replaced by younger person.

Note:

Everything Mary Greene told me did happen, as Mary Greene is now a Security Officer and at Lincoln PK. Campus, and Evita Evans did give up her rank and is now an Officer at Loop Campus. Both 20's.

Eighter Ms. Green is a mind reader or upper Management leaked the infamation to her.

Ms. Greene was also correct in Saying an out side investogtor would come into the department and advise employer how to legally get rid of people, and he is in

Item 13 Continued

I do believe my discharge is Pretextual, as my employer did hire an out side investigator Paul Naselli's

note: Paul Naselli is a former employee of the Human Rights Dept. holds a law degree from De Paul University.

Paul Naselli Came into the Security department of De Paul University and advised my employer how to get rid of ~~Older~~ officers legally so not law suit would Come about. Just as Ms. Greene stated it would be. Upper management is Ms. Greene's relatives.

It was Sgt. Bellizzi who discussed Officer Slacker health with Officer Larry Lewis and brought the information to Officer John Fahey and my Self. Larry Lewis neighbor of Robert Wachowski never got anything from his gossip or leaking Confidential Information.

Item 13 Continued

Due to my termination my employer saved a substantial amount of money, Such as my Pension, Salary, health Insurance Payments after my retirement by replacing me with younger persons.

I believe the above mentioned leads to age discrimination, I hope you will reach the same Conclusion.

I remain,

Evelyn J. Hunter

not yet a year ago!

To: File

From: Bob Wachowski

Subject: Investigation

Date: April 16, 1998 no

The following outline is a summary of the investigation that was conducted regarding the incident that occurred on April 3, 1998 between Mary Greene and Evelyn Hunter.

- Director Wachowski and Assistant Director Shire met with Mary Greene shortly after the incident had occurred. Ms. Greene was asked to submit in writing all of the events that led up to the confrontation (see attached). Ms. Greene did indicate that she had been taunted by officer Hunter earlier in the day. Ms. Greene also indicated that there was a confrontation between the two parties earlier in the day. Ms. Greene did admit to the Director that she lost her cool and threatened officer Hunter. She also indicated that she called Ms. Hunter a psycho-fucking bitch. Ms. Greene said that she was sorry for the incident and she realized that she should not have handled things this way.

- Director Wachowski met with Evelyn Hunter at Aprox. 4:00 p.m. on April 3, 1998. officer Hunter stated that Ms Greene had threatened her and she felt in fear of receiving bodily harm. Officer Hunter was asked to submit in writing all of the events that occurred (see attached).

- On April 3, 1998 Assistant Director Shire interviewed officer Edwin Love, who was in dispatch at the time of the incident. Officer. Love stated that he heard Ms. Greene tell officer Hunter that she would break her fucking legs so you won't be able to pee no more. He also heard Ms. Greene say don't say anything to me- stay away from me and stated that Ms. Greene called her a psycho-fucking bitch.

- On April 6, 1998 officer Marcus Ferell was interviewed by Assistant Director Shire. Ms. Greene had indicated that officer Ferell was in the dispatch area when Ms. Hunter was taunting her. Officer Ferell stated that at no [illegible] the witness and taunting by officer Hunter.

- On April 6, 1998 Director Wachowski and Assistant Director Shire met with Ms. Greene to issue her final written counseling based on the investigation. Ms. Greene was again asked for a document outlining the events that led up to the incident. Ms. Greene indicated at this time that she could not remember threatening officer Hunter or calling her a psycho-bitch. Ms. Greene also stated that the only document she was willing to turn in was the one that she e-mailed me (see attached).

Mary Greene is now an officer in the Security Department at DePaul University ?

GENERAL OFFENSE CASE REPORT
CHICAGO POLICE

SCENE

1. OFFENSE/INCIDENT–PRIMARY CLASSIFICATION	UCR OFF. CODE	2. SECONDARY CLASSIFICATION	3. R.D. NO.
AGG ASSAULT	0560	SIMPLE	C202680

4. ADDRESS OF OCCURRENCE (NO., DIR., STREET)	APT. NO.	5. FIRE RELATED	6. DATE OF OCCURRENCE – TIME (DAY, MO.)	7. BEAT OF OCCUR.	8. BEAT/UNIT ASSIGN.
25 E JACKSON		☐1 YES ☐2 NO	3 APR 98 1440	~~1132~~	9188

9. TYPE OF LOCATION OR PREMISE WHERE OFFENSE OCCURRED (GIVE NAME OF LOCATION IF APPLICABLE)	10. LOCATION CODE	11. DATE R.O. ARRIVED – TIME	12.	
BUSINESS OFFICE Boyle	140	3 APR 98 1806	0123 ☐2 ON VIEW	☐1 C.O.S. ☐3 SUPERVISOR

All information, descriptions and statements in this entire report are approximations or summarizations unless indicated otherwise.

VICTIMS / ADDITIONAL VICTIMS

20. NO. VICTIMS	21. NAME (LAST–FIRST–M.I.)	IDENTITY VERIFIED	22. HOME ADDRESS (NO., DIR., STREET, APT. NO.)	23. SEX–RACE–AGE CODE	24. HOME PHONE	25. BUSINESS PHONE	26. TIME AVAIL.	27. OCCUPATION	28. INJURED YES NO	29. VICTIM REL. CODE
	HUNTER EVELYN	☐	60618 3562 W HENDERSON F 2 56		773 588 1351	312 362 8400	Any Day	PUBLIC SAFTY		22
		☐								
	PARENT/GUARDIAN, IF JUVENILE									

RACE CODES: 1-BLACK 2-WHITE 3-BLACK HISPANIC 4-WHITE HISPANIC 5-AMER. IND./ALASK. NAT. 6-ASIAN/PACIFIC ISLANDER

DATA ENTERED

WITNESS

30. NO. WIT.	31. ☐1 DISCOVERED ☐2 WITNESSED ☐3 REPORTED OFFENSE	32.	33.	34.	35.	36.
DNA ☐	☐ ☐ ☐					
UNK ☐	☐ ☐ ☐					

OFFENDER

40. NO. OFF.	41. OFFENDER'S NAME (OR DESCRIBE CLOTHING, ETC.)	42. HOME ADDRESS	43. SEX–RACE–AGE	HEIGHT	WEIGHT	EYES	HAIR	COMPL.	MARKS, SCARS, ETC.	44. C.B./I.R. NO.	45. OFFENDER REL. CODE
DNA ☐ UNK ☐	GREENE MARE	25 E JACKSON	F 2 21	5'6	165	GRN	MED BRO	Fair	Non Vis	-	22

CIRCUMSTANCES

50. 51 OBJECT/WEAPON ☐1 USED ☐2 DISPLAYED ☐3 UNK
- ☐01 HAND GUN ☐02 SHOTGUN ☐03 RIFLE ☐04 KNIFE ☐05 VEHICLE ☐06 BLUNT INSTRUMENT ☐07 THROWN OBJECT ☐08 EXPLOSIVE ☐09 LIQUID/GAS ☐10 BOTTLE/GLASS ☐11 RAZOR ☐12 PRY TOOL ☐13 HAND, FEET ☐14 OTHER ☐15 DNA

52. FIREARM FEATURES: ☐01 CHROME/NICKEL ☐02 BLUE STEEL ☐03 SHORT BARREL ☐04 LONG BARREL ☐05 SAWED OFF ☐06 OTHER ☐07 UNKNOWN ☐08 DNA

53. POINT/ENTRY: ☐01 FRONT DOOR ☐02 REAR DOOR ☐03 WINDOW ☐04 ROOF ☐05 FLOOR ☐06 SIDE DOOR ☐07 OTHER ☐08 UNKNOWN ☐09 DNA

54. POINT/EXIT: ☐01 FRONT DOOR ☐02 REAR DOOR ☐03 WINDOW ☐04 ROOF ☐05 FLOOR ☐06 SIDE DOOR ☐07 OTHER ☐08 UNKNOWN ☐09 DNA

55. BURGLAR ALARM: ☐DNA; ON PREMISE ☐1 YES ☐2 NO; ALARM CIRCUMVENTED ☐1 YES ☐2 NO

56. SAFE BURGLARY METHOD: ☐01 PUNCH ☐02 TORCH ☐03 EXPLOSIVE ☐04 DRILL ☐05 REMOVED ☐06 PEEL ☐07 OPEN ☐08 UNKNOWN ☐09 DNA

57. IF RESIDENCE, WHERE WERE OCCUPANTS: ☐01 WORK ☐02 VISITING ☐03 VACATION ☐04 WEDDING ☐05 FUNERAL/WAKE ☐06 OTHER ☐07 UNKNOWN ☐08 DNA

58. UNUSUAL CHARACTERISTICS OF OFFENSE

GANG RELATED (AFFILIATION) ☐VICTIM ☐OFFENDER

DATA REFERRED DD AREA 1

PROPERTY

70. 71. DESCRIBE PROPERTY IN NARRATIVE — T - TAKEN; R - RECOVERED

1 MONEY	2 JEWELRY	3 FURS	4 CLOTHING	7 OFFICE EQUIPMT.	8 TV, RADIO, STEREO	9 HOUSEHOLD GOODS	0 CONSUM. GOODS	() FIREARMS	& Narc./Dang. Drugs	5 OTHER	6 NONE
☐T $ ☐R	☐T $ ☐R	☐T $ ☐R	☐T $ ☐R	☐T $ ☐R	☐T $ ☐R	☐T $ ☐R	☐T $ ☐R	☐T $ ☐R	☐T $ ☐R	☐T $ ☐R	☐T ☐R

72. VEHICLE/TRAILER ☐STOLEN ☐THEFT FROM ☐OFFENDER'S	YEAR	MAKE	BODY STYLE	COLOR	V.I.N.	STATE LICENSE NO.	STATE	EXPIR. MO/YR	73. PROPERTY INVENTORY NO(S).	74. VEH. INVENTORY NO. POUND

NARRATIVE

80. NARRATIVE (Do not duplicate or repeat information – for explanation or additional information only)

#11379 Victim related to R/O that a co-workers that she would break both of her legs and that she would never ~~see~~ again if she ever walked away from her again.

98093 11379

81. SOBRIETY OF VICTIM ☐1 SOBER ☐2 HBD

82. FLASH MESSAGE SENT? ☐1 YES ☐2 NO

☐ NO ADDITIONAL INFORMATION

POLICE PERSONNEL

90. 91. EXTRA COPIES REQUIRED ... NORMAL — ☐ CONT'D. OTHER SIDE — ☐ R.O.

92. OFFICER NOTIFYING FOLLOW-UP INVESTIG. UNIT — UNIT NOTIFIED — PERSON ☐NOTIFIED ☐ARRIVED — DATE (DAY-MO-YR) — TIME

93. FIRST OFFICER AT SCENE — 94. OFFICER NOTIFYING ☐1ST D/S ☐E.T. ☐M.E. — PERSON ☐NOTIFIED ☐ARRIVED — DATE (DAY-MO-YR) — TIME

95. REPORTING OFFICER'S NAME (PRINT)	STAR NO.	OFFICER'S SIGNATURE	DATE INVEST. COMPLETED – TIME	97. SUPERVISOR APPROVING (PRINT NAME)	STAR NO.
William Mack	17983	William Mack	03 APR 98 1830	W. B. Doyle	632
96. REPORTING OFFICER'S NAME (PRINT)	STAR NO.	OFFICER'S SIGNATURE		APPROVAL SIGNATURE: W. B. Doyle	APPROVED APR 3 '98 23:49

CPD-11.380 (Rev. 8/96)

CONTINUATION OF NARRATIVE

R.D. NO

-88 APR 1998 | 122222

I HAVE REVIEWED THE REPORT AND BY MY SIGNATURE INDICATE THAT IT IS ACCEPTABLE. | SUPERVISOR'S SIGNATURE | DATE (DAY-MO-YR.)

FOR USE BY BUREAU OF INVESTIGATIVE SERVICES ONLY

I-UCR OFFENSE CODE – ☒ CORRECT ☐ 2 REVISED | REV. CODE | I-UCR METHOD CODE | METHOD ASSIGNED ☐ 1 FIELD ☒ SUMMARY ☐ 2 ADMIN. | UNIT NO. 640 | OFFICER ASSIGNED STAR NO. 20436 | DATE ASSIGNED APR 7 1998 | SUPV. 684 | INVESTIGATIVE FILE ☐ 1 YES ☒ NO | REASSIGNED ☐ 1 YES ☐ 2 NO

OFFICER REASSIGNED – STAR NO. | DATE | STATUS ☐ 0 PROGRESS ☐ 1 SUSPENDED ☐ 2 UNFOUNDED ☐ 3 CLEARED CLOSED ☐ 4 CLEARED OPEN ☐ 5 EXC. CLRD. CLOSED ☐ 6 EXC. CLEARED OPEN ☐ 7 CLOSED–NON-CRIMINAL

IF CASE IS CLEARED, HOW CLEARED (USE THIS BOX FOR SINGLE CLEAR UP OR FIRST CLEAR UP OF MULTIPLE CLEAR UP LIST) ☐ 1 ARREST & PROSECUTION ☐ 2 DIRECTED TO FAMILY COURT ☐ 3 COMPL. REFUSED TO PROSECUTE ☐ 4 COMMUNITY ADJUSTMENT ☐ 5 OTHER EXCEPTIONAL | ☐ ADULT ☐ JUV.

VICTIM IDENTIFIERS ☐ 1 CORRECT ☐ 2 REVISED | VICTIM NO. | REVISED NAME | REVISED ADDRESS | REVISED PHONE NO. ☐ HOME ☐ BUSINESS

VALUE OF PROPERTY TAKEN/RECOVERED ☐ 1 DNA ☐ 2 VERIFIED ☐ 3 CORRECTED

FILL IN THE FULL AMOUNT OF ONLY THOSE VALUES WHICH EITHER DIFFER FROM OR WERE NOT REPORTED ON THE REVERSE, THE NARRATIVE OR A SUPPLEMENTARY REPORT.

1 MONEY	2 JEWELRY	3 FURS	4 CLOTHING	7 OFFICE EQUIPMT.	8 TV, RADIO, STEREO	9 HOUSEHOLD GOODS	10 CONSUM. GOODS	11 FIREARMS	14 NARC/DANG. DRUGS	15 OTHER	16 NONE
☐ T $	☐ T $	☐ T $	☐ T $	☐ T $	☐ T $	☐ T $	☐ T $	☐ T $	☐ T $	☐ T $	☐ T
☐ R	☐ R	☐ R	☐ R	☐ R	☐ R	☐ R	☐ R	☐ R	☐ R	☐ R	☐ R

SERIAL NOS. OR IDENTIFICATION NOS. ☐ 1 DNA ☐ 2 VERIFIED ☐ 3 CORRECTED | LIST ALL CORRECTIONS & NEW OR ADDITIONAL NOS. OBTAINED

REMARKS (PERTINENT INFORMATION NOT ON ORIGINAL REPORT)

PREPARED BY – SIGNATURE | STAR NO. | DATE (DAY-MO-YR.) | APPROVED BY – SIGNATURE | STAR NO. | DATE (DAY-MO-YR.)

____

____

____

____

14. [AGE DISCRIMINATION ONLY] Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☐ YES ☐ NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff [check all that apply]

(a) ☐ Direct the defendant to hire the plaintiff.

(b) ☒ Direct the defendant to re-employ the plaintiff.

(c) ☐ Direct the defendant to promote the plaintiff.

(d) ☒ Find that the defendant failed to reasonably accommodate the plaintiff's religion.

(e) ☒ Find that the defendant failed to reasonably accommodate the plaintiff's disabilities.

?

(f) ☐ Direct the defendant to (specify):______________________________________

____

____

(g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.

(h) ☒ Grant such other relief as the Court may find appropriate.

(Plaintiff's signature) Evelyn J. Hunter

(Plaintiff's name) EVElyN J. HUNTER

(Plaintiff's street address) 3308-N- ALBANY ST

apt. B CHICAGO, Il. 60618

(City) Chicago (State) Il. (ZIP) 60618

(Plaintiff's telephone number) (773)- 588 - 1351

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Evelyn Hunter 3308 N ALBANY ST #B CHICAGO, IL 60618	From: E.E.O.C Chicago District Office 500 W. Madison Street Suite 2800 Chicago, IL 60661-2511

☐ *On behalf of a person aggrieved whose identity is CONFIDENTIAL (29 C.F.R. 1601.7(a))*

Charge Number	EEOC Representative	Telephone Number
21B990395	Nola Smith, S&L Coord.	(312) 886-5973

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- ☐ The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- ☐ Your allegations did not involve a disability that is covered by the Americans with Disabilities Act.
- ☐ The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- ☐ We cannot investigate your charge because it was not filed within the time limit required by law.
- ☐ Having been given 30 days in which to respond, you failed to provide information, failed to appear or be available for interviews/conferences, or otherwise failed to cooperate to the extent that it was not possible to resolve your charge.
- ☐ While reasonable efforts were made to locate you, we were not able to do so.
- ☐ You had 30 days to accept a reasonable settlement offer that affords full relief for the harm you alleged.
- ☐ The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- ☒ The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- ☐ Other *(briefly state)* __________

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form)

Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this Notice;** otherwise, your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit based on this charge, please send a copy of your court complaint to this office.

On Behalf of the Commission

[signature]

John P. Rowe, District Director

3 March 2000
(Date)

Enclosure(s)

cc: DEPAUL UNIV
25 E JACKSON BLVD
CHICAGO, IL 60604

STATE OF ILLINOIS
DEPARTMENT OF HUMAN RIGHTS

IN THE MATTER OF:	)	
EVELYN HUNTER,	)	
COMPLAINANT,	)	CHARGE NO. 1999CA11 EEOC NO. 21B9903
AND	)	
DEPAUL UNIVERSITY,	)	
RESPONDENT.	)	

NOTICE OF DISMISSAL
FOR LACK OF SUBSTANTIAL EVIDENCE

Ms. Evelyn Hunter
3308 N. Albany St., Apt. #B
Chicago, IL 60618

Mr. Andrew Kopon
Attorney at Law
Cremer, Kopon, Shaughnessy
Spina
225 W. Wacker Dr., Ste 2500
Chicago, IL 60606

DATE: July 20, 1999

REQUEST FOR REVIEW FILING DEADLINE: August 24, 1999

1. YOU ARE HEREBY NOTIFIED that based upon the enclosed investigation report in this matter, the DEPARTMENT OF HUMAN RIGHT (DHR) has determined that there is not SUBSTANTIAL EVIDENCE to support the allegations of the charge(s). Accordingly, pursuant t Section 7A-102(D) of the Human Rights Act (775 ILCS 5/1-101 et. se and its Rules and Regulations (56 Ill. Adm. Code. Chapter II, Sect 2520.810), the charge(s) is (are) HEREBY DISMISSED.

2. If Complainant disagrees with this action, Complainant may seek review of this dismissal before the CHIEF LEGAL COUNSEL (CLC), Illinois Department of Human Rights, 100 West Randolph Street, Sui 10-100, Chicago, Illinois 60601 by filing a "Request for Review" w the CLC within 30 days after receipt of this Notice, by the reques for review filing deadline above. Respondent will be notified by CLC if a Request for Review is filed.

Continued on page two

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: Evelyn Hunter
3308 N ALBANY ST #B
CHICAGO, IL 60618

From: E.E.O.C
Chicago District Office
500 W. Madison Street Suite 2800
Chicago, IL 60661-2511

☐ *On behalf of a person aggrieved whose identity is CONFIDENTIAL (29 C.F.R. 1601.7(a))*

Charge Number	EEOC Representative	Telephone Number
21B990395	Nola Smith, S&L Coord.	(312) 886-5973

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

☐ The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
☐ Your allegations did not involve a disability that is covered by the Americans with Disabilities Act.
☐ The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
☐ We cannot investigate your charge because it was not filed within the time limit required by law.
☐ Having been given 30 days in which to respond, you failed to provide information, failed to appear or be available for interviews/conferences, or otherwise failed to cooperate to the extent that it was not possible to resolve your charge.
☐ While reasonable efforts were made to locate you, we were not able to do so.
☐ You had 30 days to accept a reasonable settlement offer that affords full relief for the harm you alleged.
☐ The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
☒ The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
☐ Other *(briefly state)* ____________________

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form)

Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this Notice;** otherwise, your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit based on this charge, please send a copy of your court complaint to this office.

On Behalf of the Commission

[signature]

John P. Rowe, District Director

3 March 2000
(Date)

Enclosure(s)

cc: DEPAUL UNIV
25 E JACKSON BLVD
CHICAGO, IL 60604

CHARGING PARTY COPY

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy act statement before completing this form.

AGENCY
[X] FEPA
[X] EEOC

CHARGE NUMBER
1999CA1133

Illinois Department of Human Rights and EEOC
State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.) MS. EVELYN HUNTER	HOME TELEPHONE (Include Area Code) 773-588-1351
STREET ADDRESS 2308 N. ALBANY ST., APT. B — CITY, STATE AND ZIP CODE CHICAGO, IL 60618	DATE OF BIRTH 8/31/42

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one, list below.)

NAME DEPAUL UNIVERSITY	NUMBER OF EMPLOYEES, MEMBERS 15+	TELEPHONE (Include Area Code) 312-362-8500
STREET ADDRESS 25 E. JACKSON BLVD. — CITY, STATE AND ZIP CODE CHICAGO, IL 60604		COUNTY COOK
NAME		TELEPHONE (Include Area Code)
STREET ADDRESS — CITY, STATE AND ZIP CODE		COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

[ ] RACE [ ] COLOR [ ] SEX [ ] RELIGION [ ] NATIONAL ORIGIN
[ ] RETALIATION [X] AGE [ ] DISABILITY [ ] OTHER

DATE DISCRIMINATION TOOK PLACE
EARLIEST (ADEA/EPA) 11/6/98 LATEST (ALL) 11/6/98
[ ] CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s))

I. A. ISSUE/BASIS
DISCHARGE ON NOVEMBER 6, 1998 DUE TO MY AGE, 56

B. PRIMA FACIE ALLEGATIONS

1. I am 56 years of age.

2. I was performing my job of public safety officer satisfactorily.

3. On November 6, 1998, I was discharged by Randy Shire (30's) Assistant Director of Security, for allegedly creating a hostile work environment which arose out of the fact that I was openly discussing the medical condition of another employee. The allegations are untrue. I never discussed anything about the medical condition of any employee.

cont'd.

[X] I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone Number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

"OFFICIAL SEAL"
Marilyn Sanchez
Notary Public, State of Illinois
My Commission Expires Aug. 7, 2001
Notary Public Seal

NOTARY - (when necessary for State and Local Requirements) 11/10/98

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT — DATE
Evelyn J. Hunter 11/10/98

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year)

EEOC TEST FORM 6 (5/98)

4. I believe that the reason given for my discharge is pretextual because my employer had hired an outside investigator, Paul Naselli, to come in and recommend how to legally get rid of employees and that my employer was searching for a way to end the employment relationship.

5. Larry Lewis (30's) also was accused of creating a hostile work environment as I was but he was not discharged.

6. Evita Evans (20's) replaced me.

WVE/DAB/kir

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy act statement before completing this form.

AGENCY: [X] FEPA [X] EEOC

CHARGE NUMBER: 1999CA1133

Illinois Department of Human Rights and EEOC
State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.) MS. EVELYN HUNTER	HOME TELEPHONE (Include Area Code) 773-588-1351
STREET ADDRESS 2308 N. ALBANY ST., APT. B — CITY, STATE AND ZIP CODE CHICAGO, IL 60618	DATE OF BIRTH 8/31/42

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one, list below.)

NAME DEPAUL UNIVERSITY	NUMBER OF EMPLOYEES, MEMBERS 15+	TELEPHONE (Include Area Code) 312-362-8500
STREET ADDRESS 25 E. JACKSON BLVD. — CITY, STATE AND ZIP CODE CHICAGO, IL 60604		COUNTY COOK
NAME		TELEPHONE (Include Area Code)
STREET ADDRESS — CITY, STATE AND ZIP CODE		COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box (es))

[ ] RACE [ ] COLOR [ ] SEX [ ] RELIGION [ ] NATIONAL ORIGIN
[ ] RETALIATION [X] AGE [ ] DISABILITY [ ] OTHER

DATE DISCRIMINATION TOOK PLACE
EARLIEST (ADEA/EPA) 11/6/98 LATEST (ALL) 11/6/98
[ ] CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s))

I. A. ISSUE/BASIS
DISCHARGE ON NOVEMBER 6, 1998 DUE TO MY AGE, 56

B. PRIMA FACIE ALLEGATIONS

1. I am 56 years of age.

2. I was performing my job of public safety officer satisfactorily.

3. On November 6, 1998, I was discharged by Randy Shire (30's) Assistant Director of Security, for allegedly creating a hostile work environment which arose out of the fact that I was openly discussing the medical condition of another employee. The allegations are untrue. I never discussed anything about the medical condition of any employee.

cont'd.

[X] I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone Number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

"OFFICIAL SEAL"
Marilyn Sanchez
Notary Public, State of Illinois
My Commission Expires Aug. 7, 2001
Notary Public Seal

NOTARY (when necessary for State and Local Requirements) 11/10/98

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge information and belief.

SIGNATURE OF COMPLAINANT — DATE
Evelyn J. Hunter 11/10/98

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year)

EEOC TEST FORM 6 (5/98)

4. I believe that the reason given for my discharge is pretextual because my employer had hired an outside investigator, Paul Naselli, to come in and recommend how to legally get rid of employees and that my employer was searching for a way to end the employment relationship.

5. Larry Lewis (30's) also was accused of creating a hostile work environment as I was but he was not discharged.

6. Evita Evans (20's) replaced me.

WVE/DAB/kir